

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA**

WANDA COOPER in her individual capacity	:
and as administrator of the estate of the	:
decedent AHMAUD ARBERY	:
Plaintiff	:
	Civil Action
v.	2:21-CV-20-LGW-BWC
TRAVIS McMICHAEL et al.,	:
	:
Defendants.	:

**PLAINTIFF'S MOTION TO EXTEND THE DEADLINE TO RESPOND TO DEFENDANT
RICKY MINSHEW'S MOTION TO DISMISS (Doc. 124) AND LEAVE TO FILE AN
OMNIBUS RESPONSE TO ALL DEFENDANTS' MOTIONS TO DISMISS**

COMES NOW Plaintiff Wanda Cooper pursuant to Southern District of Georgia Local Rule 7.1(a) and moves this Honorable Court for an extension of time to respond to Defendant Ricky Minshev's Motion to Dismiss (Doc. 124) and leave to file an Omnibus Response in Opposition to all Defendants' anticipated Motions to Dismiss and exceed the page limitations such that Plaintiff be permitted seventy-five (80) pages to address respond to all Defendants' Statements of Facts and Legal Argument. In support of this motion, Plaintiff avers as follows:

1. On February 22, 2022, Plaintiff filed her First Amended Complaint ("FAC") alleging violations of the United States Constitution and Georgia state law by Gregory McMichael, Travis McMichael, William Bryan, Police Officer Robert Rash, Police Officer Ricky Minshev, District Attorney Jackie Johnson, District Attorney George Barnhill, and Glynn County. (Doc. 110).
2. On February 25, 2022, Glynn County filed a Motion to Strike Plaintiff's FAC

(Doc. 114).

3. On March 11, 2022, Plaintiff filed a Response in Opposition to Glynn County's Motion to Strike. (Doc. 117) and a Motion for Leave to file her FAC Nunc Pro Tunc. (Doc. 118).

4. This Honorable Court issued an Order that Defendants were not required to respond to Plaintiff's FAC until after Glynn County's Motion to Strike was ruled on. (Doc. 116).

5. On March 29, 2022, Ricky Minshew filed a Motion to Dismiss Plaintiff's FAC. (Doc. 124).

6. On April 12, 2022, Plaintiff filed a Motion to extend the time to respond to Ricky Minshew's Motion to Dismiss until after Glynn County's Motion to Strike was ruled on. (Doc. 125).

7. On April 13, 2022, this Honorable Court granted Plaintiff's Motion to Extend and ordered that Plaintiff shall file her response to Ricky Minshew's Motion to Dismiss no later than 14 days after the motion to strike is resolved. (Doc. 126)

8. On August 8, 2022, this Honorable Court granted Plaintiff's Motion for Leave to file her FAC Nunc Pro Tunc and denied Glynn County's Motion to Strike. (Doc. 128).

9. The deadlines created by the Court's August 8, 2022 Order read in conjunction with the Court's April 13, 2022 Order are as follows:

- Plaintiff is required to respond to Defendant Ricky Minshew's Motion to Dismiss on or before August 22, 2022.

- Defendants are required to file Responses to Plaintiff's FAC on or before August 29, 2022.

10. Undersigned counsel anticipates that multiple Defendants will file Motions to Dismiss Plaintiff's FAC.

11. Plaintiff now moves to extend the deadline to respond to Defendant Ricky Minshew's Motion to Dismiss and all Defendants' anticipated Motions to Dismiss until September 28, 2022, which is 30 days after the deadline for Defendants to file responses to Plaintiff's FAC.

12. Plaintiff also moves for leave to file an Omnibus Response in Opposition to all Defendants' anticipated Motions to Dismiss and exceed the page limitations such that Plaintiff be permitted seventy-five (75) pages to respond to all Defendants' Statements of Facts and Legal Argument.

13. Richard K. Strickland Esq., counsel for Ricky Minshew, does not object to Plaintiff's Motion to Extend

14. No parties will be prejudiced if Plaintiff is granted leave to file an Omnibus Response in Opposition to all Defendants' anticipated Motions to Dismiss that exceeds page limitations, and judicial economy will be promoted.

Respectfully Submitted

//s// Mark V. Maguire
Mark V. Maguire, Esquire
McELDREW YOUNG PURTELL
123 South Broad Street
Philadelphia, PA 19109

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Defendants.	:	

ORDER

AND NOW, this _____ day of _____, 20__, upon consideration of the Plaintiff's Motion, it is hereby **ORDERED** as follows:

15. Plaintiff shall be permitted to respond to Defendants' Motions to Dismiss on or before September 28, 2022 by way of Omnibus Response, not to exceed 80 pages.

CHEESBRO, J.

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CERTIFICATE OF SERVICE

I hereby certify that I will make a true and correct copy of Plaintiff's Motion to Extend Deadline and Motion to file Omnibus Motion and Exceed Page Limits available on the PACER ECF system which will send an electronic notice to all participating counsel of record.

//s// Mark V. Maguire
Mark V. Maguire, Esquire
McELDREW YOUNG PURTELL
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Philadelphia, PA 19109